

IN THE
UNITED STATES DISTRICT COURT OF

FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING

2016 NOV 21 PM 1:38

CHEYENNE, WYOMING.,

STEPHAN JARRIS, CLERK

10-CV-287F

John Robert Demos, &
THE SOCIETY OF T.R.U.T.H.
VS (PLAINTIFF'S)

AIRIA GROUP INC.,

IORIHARD INC.,

PHILIP MORRIS INTL. INC.,

Reynolds American INC.,

U.S.D.C. CASE #

"THE ANTI-TRUST CIVIL PROCESS ACT" And

"ANTI-TRUST COMPLAINT, 'A MONOPOLY IN

RESTRAINT OF TRADE, AND A COMBINATION"

PURSUANT TO, 15 USC A 1311, 1 THRU 7, 12 THRU 27,

THE NOERR-PENNINGTON DOCTRINE, THE 1890

SHERMAN ANTI-TRUST ACT, THE 1914 CLAYTON

ACT, THE 1914 FEDERAL TRADE COMMISSION ACT,

28 STAT. 570, 28 USC 1332, 226 U.S. 61,

221 U.S. 1, 312 U.S. 600, 435 U.S. 389,

419 U.S. 186, 384 U.S. 279, 250 U.S. 300,

THE 1976 ANTI-TRUST IMPROVEMENT ACT,

(DEFENDANTS)

TO: THE CLERK OF THE COURT.

COMES NOW THE PLAINTIFF'S, WHO AVER, AND DEPOSE THE
FOLLOWING UNDER THE PAIN & PENALTY OF PERJURY.

A: THAT THE NAMED DEFENDANTS IN THIS COMPLAINT ARE
ENGAGED IN AN UNREASONABLE RESTRAINT OF TRADE, BY WAY
OF A CONSPIRACY, CONTRACT, OR COMBINATION IN RESTRAINT
OF TRADE, OR MONOPOLIZATION, OR ATTEMPT TO MONOPOLIZE,
554 F.2d 633, 679 F.3d 278, 673 F.3d 430, BY WAY OF
(1) UNITY OF PURPOSE, (2) COMMON DESIGN, (3) UNDERSTANDING,
(4) MEETING OF THE MINDS, (5) SPECIFIC INTENT, (6) COLLUSION,
602 F.3d 237.

Argument

I CHARGE,
ATRIA GROUP,
LORILLARD INC,
PHILLIP MORRIS INTL, INC.,
Reynolds American Inc,

With being IN VIOLATION OF THE U.S. ANTI-TRUST LAWS, AND
With being IN VIOLATION OF THE 1890 SHERMAN ANTI-TRUST
ACT.

THE ACTIVITIES OF THE NAMED DEFENDANTS POSE A
THREAT TO THE FREE MARKET AND RESTRAIN
COMPETITION, WHICH IT CANNOT DO.

THE PRACTICES OF THE NAMED DEFENDANTS ARE
COHUSIVE, EXCLUSIONARY, AND MONOPOLISTIC, AND
RESTRAIN COMPETITION, WHICH POSES A DANGER OF
INCREASED PRICES, REDUCED OUTPUT, QUALITY, AND
INNOVATION, IN THE MARKET PLACE, IN VIOLATION OF
THE 1914 CLAYTON ACT, THE 1914 FEDERAL TRADE
COMMISSION ACT, WHICH PROHIBITS EVERY CONTRACT,
COMBINATION, OR CONSPIRACY IN RESTRAINT OF
INTERSTATE OR FOREIGN TRADE, OR COMMERCE.

THE NAMED DEFENDANTS PRACTICES OF PRICE
DISCRIMINATION, TYING ARRANGEMENTS, EXCLUSIVE
DEALING MERGERS, AND INTER-LOCKING

DIRECTORATES, CONSTITUTE UNFAIR METHODS OF COMPETITION, AND CONSTITUTE A DANGER TO THE MAINTENANCE OF THE AMERICAN FREE ENTERPRISE SYSTEM.

THE NAMED DEFENDANTS, SYSTEM OF VERTICAL AND HORIZONTAL AGREEMENTS, MERGERS, AND SINGLE FIRM ACTIVITIES DIRECTED TOWARD THE ACQUISITION AND MAINTENANCE OF A MONOPOLY VIOLATE ANTI-TRUST LAW AGAINST PREDATORY BEHAVIOR IN RESTRAINT OF TRADE, TO INCLUDE TRUSTS, HOLDING COMPANIES, CARTELS, AND MERGERS & ACQUISITIONS.

THE ACTIONS OF THE NAMED DEFENDANTS DEFLATE ECONOMIC OPPORTUNITY, STAGNATE FAIR CONSUMER PRICES, EFFICIENCY, AND POLITICAL LIBERTY, WHICH LEADS TO PRICE FIXING.

THE NAMED DEFENDANTS ECONOMIC CONCENTRATION, DOMINANT MARKET POWER, IS WRONGFUL CONDUCT, AS OPPOSED TO COMPETITION ON THE MERITS.

IN THE FIELD OF SMOKING TOBACCO

THE NAMED DEFENDANTS ARE THE DOMINANT INDUSTRY INCUMBENTS, WHICH ALLOWS THEM TO CONTROL THE MARKET AND INSTITUTE PREDATORY PRICING.

NONE OF THE DEFENDANTS ACTIONS CAN BE JUSTIFIED

UNDER THE UMBRELLA OF EFFICIENCY, AS THE NAMED
DEFENDANTS SOLE MOTIVATION IS TO THWART THE
POSSIBLE RISE OF EFFECTIVE NEW COMPETITION TO THE
NAMED DEFENDANTS MONOPOLY IN
SMOKING TOBACCO

AS FURTHER EVIDENCE IN SUPPORT, THE NAMED DEFENDANTS
COMPETITORS RANK NEAR THE BOTTOM OF THE LIST.
PLAINTIFF'S JOHN R. DEMOS, AND THE SOCIETY OF T.R.U.T.H.
BRING THIS ACTION IN GOOD FAITH, AND WITH CLEAN HANDS,
AND IN THE CAPACITY OF A PRIVATE ATTORNEY GENERAL.

Relief

1. I SEEK A JURY TRIAL.

I SEEK THE APPOINTMENT OF COUNSEL.

I SEEK \$30 MILLION IN HEDONIC, COMPENSATORY, PUNITIVE, CONTINUING, DECLARATORY, TREBLE, STATUTORY, GENERAL, SPECIAL, PECUNIARY, ALL-PURPOSE, PROHIBITIVE, PROSPECTIVE, EXEMPLARY, INCIDENTAL, ACCUMULATIVE, SPECULATIVE, CONSEQUENTIAL, MITIGATING, NECESSARY, REMEDIAL, RECISORY, AND EMOTIONAL DAMAGES.

I SEEK ANY, AND ALL OTHER RELIEF AS THE COURT DEEMS TO BE NECESSARY & PROPER.

Conclusion

1. The Period of This Conspiracy has been Indefinite, And For At least 25+ years.
2. The Object of the Conspiracy is To Control the Market, Effectuate Prices, And Restrain Trade.
3. The Named Defendants To Achieve Their Objective Have Engaged In,
 - A. Collusion,
 - B. A Combination or Conspiracy, between Defendants,
 - C. A Conspiracy to Maintain + Fix Prices,
 - D. A Restraint upon Interstate Commerce,
 - E. A Public, And A Private Injury,
 - F. A Contract, Combination, Conspiracy, And Monopolization,
 - G. A Concerted Action to Restrain Trade, And Institute An Anti-Competitive Market,
 - H. False Information to the Media,
 - I. Acquiescence, + Secrecy,
 - J. Parallel Pricing,
 - K. A Combination to Effectuate An International Price Fixing scheme,

[s] John R. Dempsey

11-10-2016

Address / PHONE # / & C.E.O. OF EACH DEFENDANT

1. Reynolds American Inc - 401 NORTH MAIN STREET
WINSTON SALEM, NORTH CAROLINA. 27101
DANIEL M. DELEN (C.E.O.)
2. Philip Morris Intl, Inc - 120 PARK AVENUE - N.Y. N.Y. 10017
Louis C. CAMILLERI (C.E.O.)
3. Lorillard Inc - 714 GREEN VANEY ROAD - MURRAY S. KESSLER (C.E.O.)
GREENSBORO, NORTH CAROLINA. 27408
4. Atria Group Inc - 6601 WEST BROAD STREET
RICHMOND, VA. 23230
MICHAEL E. SZYMANCZYK (C.E.O.)

AFFIDAVIT - 267 F.2d 866,

STATE OF WASHINGTON)
COUNTY OF WAHIA WAHIA) ss:

I, John R. Demos, DECLARE UNDER PENALTY OF PERJURY THAT THE FOLLOWING STATEMENTS WITHIN THIS AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND HAS BEEN EXECUTED ON 11-12-2016, AT THE WASHINGTON STATE PENITENTIARY.

A: THAT WHICH HAS A PERMISSABLE PURPOSE, CANNOT BE USED TO JUSTIFY THAT WHICH HAS AN IMPERMISSABLE EFFECT, 407 U.S. 451,

B: I INVOKE THE JURISDICTION OF THE U.S. DISTRICT COURT PURSUANT TO, 28 USC 1331, 1332, 1335, 1337, 1340, 1342, 1346, 1361, & 1585,

C: I INVOKE THE COURT'S EXTRA-TERRITORIAL JURISDICTION, PURSUANT TO, 542 U.S. 466, 410 U.S. 484,

/s/ John R. Demos

AFFIDAVIT #1

STATE OF WASHINGTON)

COUNTY OF WAAA WAAA) ss:

I, John R. Demos, declare under penalty of perjury that the following statements within this affidavit are true and correct to the best of my knowledge and has been executed on this 10th day of November, 2016, at

THE WASHINGTON STATE PENITENTIARY
in the County of Walla Walla, Washington:

A: I CHARGE THE NAMED DEFENDANTS WITH BEING IN VIOLATION OF,
THE ANTI-RACKETEERING ACT,
THE ROBINSON-PATMAN ACT,
THE WILSON TARIFF ACT,
THE ECONOMY ACT,
THE POWER ACT,
THE WEBB-POMERANCE ACT,
THE NORRIS-IA GUARDIA ACT,
THE CAPPER-VOLSTEAD ACT,
THE INTERSTATE COMMERCE ACT,
THE NATIONAL LABOR RELATIONS ACT,
THE NOERR-PENNINGTON DOCTRINE,

John Demos
(Affiant's Name)

Subscribed and Sworn to before me this 10th day of November, 2016.

Notary Public
State of Washington
VENETTA E JACKSON
MY COMMISSION EXPIRES
APRIL 1, 2017

Cherita E. Jackson
Notary Public in and for the
State of Washington.
Residing in Walla Walla, WA
My commission expires April 1, 2017

AFFIDAVIT #2

STATE OF WASHINGTON)

) ss:

COUNTY OF WALLA WALLA

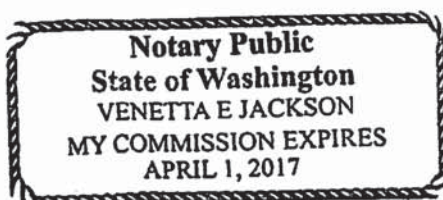
I, John Robert Demos, declare under penalty of perjury that the following statements within this affidavit are true and correct to the best of my knowledge and has been executed on this 21st day of October, 2016,

THE WASHINGTON STATE PENITENTIARY
in the County of Walla Walla, Washington:

A: I CHARGE THE DEFENDANTS WITH CONSPIRACY. AS THE DEFENDANT ENTITIES, FOREIGN SUPPLIER, AND ITS AMERICAN SUBSIDIARIES, ARE OPERATED AND PORTRAYED AS "SINGLE GLOBAL ENTERPRISE" WITH KEY EXECUTIVES OVERLAPPING, AND VITAL MANAGEMENT PERSONNEL BEING ROTATED THROUGH POSITIONS IN THE UNITED STATES AND EUROPE.

John R. Demos
(Affiant's Name)

Subscribed and Sworn to before me this 20th day of October, 2016.



Venetta E. Jackson
Notary Public in and for the
State of Washington.
Residing in Walla Walla, WA
My commission expires April 1, 2017

AFFIDAVIT #3

STATE OF WASHINGTON)

) ss:

COUNTY OF WALLA WALLA

I, John R. Demos, declare under penalty of perjury that the following statements within this affidavit are true and correct to the best of my knowledge and has been executed on this 25TH day of October, 2016, at

THE WASHINGTON STATE PENITENTIARY
in the County of Walla Walla, Washington:

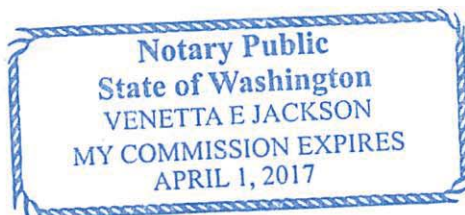
A. I INVOKE THE COURTS ANTI-TRUST JURISDICTION.

I INVOKE THE COURTS DIVERSITY JURISDICTION.

I INVOKE THE NOERR-PENNINGTON DOCTRINE.

John R. Demos
(Affiant's Name)

Subscribed and Sworn to before me this 25TH day of October, 2016.



Venetta E. Jackson
Notary Public in and for the
State of Washington.
Residing in Walla Walla, WA
My commission expires April 1, 2017

09/15/2015

Department of Corrections

PAGE : 01 OF 01

MLPERKINS

WASHINGTON STATE PENITENTIARY

OIRPLRAR

10.2.1.18

**PLRA IN FORMA PAUPERIS STATUS REPORT
FOR DEFINED PERIOD : 02/28/2015 TO 08/31/2015**

DOC# : 0000287455

NAME : DEMOS JOHN

ADMIT DATE : 07/18/1978

DOB : 08/04/1952

ADMIT TIME : 00:01

AVERAGE MONTHLY RECEIPTS	20% OF RECEIPTS	AVERAGE SPENDABLE BALANCE	20% OF SPENDABLE
4.27	0.85	1.40	0.28